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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA,
17 SACRAMENTO DIVISION
18

19 TOYISHA CULVER,

20 Plaintiff,

21 vs.

22 AMAZON.COM SERVICES LLC,

23 Defendant.

Case No. 2:24-cv-00622-JAM-AC

**STIPULATION AND ORDER TO
CONTINUE TRIAL DATE AND
PRETRIAL DEADLINES**

The Hon. John A. Mendez

Action Filed: November 29, 2023

Trial Date: October 20, 2025

Proposed Trial Date: January 20, 2025

1 Plaintiff Toyisha Culver (“Plaintiff”) and Defendant AMAZON.COM
2 SERVICES LLC (“Defendant”) (collectively, the “Parties”), by and through their
3 undersigned counsel of record, hereby respectfully submit this Joint Stipulation for
4 good cause continuing all pre-trial deadlines by 90 days.

5 WHEREAS, the Parties are currently engaging in settlement discussions that
6 appear to have strong potential to resolve the instant action;

7 WHEREAS, the Parties seek to focus their time and resources on these
8 discussions, and have concerns that not doing so could undermine the possibility of
9 resolution at this juncture;

10 WHEREAS, should settlement discussions not resolve the matter in the
11 coming weeks, the Parties will proceed with completing discovery;

12 WHEREAS, the Parties have not requested any previous trial extensions;

13 WHEREAS, the current schedule includes the following pre-trial deadlines:

- 14 - Discovery cut-off: February 28, 2025
- 15 - File MSJ /dispositive motions: April 25, 2025
- 16 - Final Pre-Trial Conference: August 29, 2025

17 ACCORDINGLY, the Parties respectfully request and stipulate that the Court
18 continue the October 20, 2025 trial date to at January 20, 2026, and all pre-trial
19 deadlines be extended by 90 days.

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1 **THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties
2 through their counsel of record, subject to the Court's approval, that:

3 The trial date be continued from October 20, 2025 to January 20, 2026.

4 That all pre-trial deadlines be extended by 90 days.

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6 Dated: January 22, 2025

FARELLA BRAUN + MARTEL LLP

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8 By: /s/ Daniela A. Archila

9 Daniela A. Archila

10 Attorneys for AMAZON.COM SERVICES
11 LLC

12 Dated: January 22, 2025

ELKIN | GAMBOA, LLP

13 By: /s/ Michael Elkin

14 Michael Elkin, Esq.

15 Attorneys for Plaintiff Toyisha Culver
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CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES

I, Daniela A. Archila, am the ECF user whose identification and password are being used to file this Joint Stipulation to Continue Trial Date and Pre-Trial Deadlines for Good Cause. I hereby attest that I have obtained the concurrence of each signatory to this document.

Dated: January 22, 2025

FARELLA BRAUN + MARTEL LLP

By: /s/ Daniela A. Archila
Daniela A. Archila

Attorneys for AMAZON.COM SERVICES
LLC

ORDER MODIFYING PRETRIAL SCHEDULING ORDER

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	Date
Discovery Cutoff	05/30/2025
Deadline to file dispositive motions	07/25/2025
Dispositive Motion Hearing	09/23/2025, at 01:00 p.m.
Final Pretrial Conference	12/12/2025, at 11:00 a.m.
Jury Trial (5-7 days)	02/02/2026, at 09:00 a.m.

All other instructions contained in the Pretrial Scheduling Order (ECF No. 5), entered on May 23, 2024, shall remain in effect.

IT IS SO ORDERED.

Dated: January 29, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE